

**IN THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF SOUTH
CAROLINA COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE
CONFERENCE OF THE NAACP, and

TAIWAN SCOTT, on behalf of himself and all
other similarly situated persons,

Plaintiffs,

v.

THOMAS C. ALEXANDER, in his official
capacity as President of the Senate; LUKE A.
RANKIN, in his official capacity as Chairman of
the Senate Judiciary Committee; JAMES H.
LUCAS, in his official capacity as Speaker of the
House of Representatives; CHRIS MURPHY, in
his official capacity as Chairman of the House of
Representatives Judiciary Committee;
WALLACE H. JORDAN, in his official capacity
as Chairman of the House of Representatives
Elections Law Subcommittee; HOWARD
KNAPP, in his official capacity as interim
Executive Director of the South Carolina State
Election Commission; JOHN WELLS, Chair,
JOANNE DAY, CLIFFORD J. EDLER, LINDA
MCCALL, and SCOTT MOSELEY, in their
official capacities as members of the South
Carolina Election Commission,

Defendants.

Civil Action No. 3:21-cv-03302-MBS-
TJH-RMG

THREE-JUDGE PANEL

**EXPERT DISCLOSURE
BY PLAINTIFFS
(CONGRESSIONAL MAP)**

Plaintiffs The South Carolina State Conference of the NAACP, and Taiwan Scott (collectively, “Plaintiffs”), by and through undersigned counsel, hereby identify the following persons they expect to call as experts at trial on the Congressional Map:

Joseph Bagley, Ph.D.
 Assistant Professor of History
 Perimeter College
 Georgia State University
 239 Cedar Lane,
 Covington, GA 30014
 jbagley3@gsu.edu

Moon Duchin, Ph.D.
 Professor of Mathematics
 Tufts University
 33 Royal Ave #1
 Cambridge, MA 02138
 the.redistricting.lab@gmail.com

Kosuke Imai, Ph.D.
 Professor of Government and Statistics
 1737 Cambridge Street
 Institute for Quantitative Social Science
 Harvard University
 Cambridge, MA 02138
 Imai@Harvard.edu

Baodong Liu, Ph.D.
 Professor of Political Science
 University of Utah
 260 S. Central Campus Drive, Room 252
 Salt Lake City, UT 84112
 baodong.liu@utah.edu

Jordan Ragusa, Ph.D.
 Associate Professor of Political Science
 College of Charleston
 J.C. Long Building, Room 206
 Charleston, SC 29401
 RagusaJM@cofc.edu

Plaintiffs certify that pursuant to the Court’s April 5, 2022, Third Amended Scheduling Order (ECF No. 210), written reports prepared and signed by Drs. Bagley, Liu, Ragusa, Imai and Duchin, including all information required by Fed. R. Civ. P. 26(a)(2)(B), were disclosed to Defendants on April 11, 2022.

Dated: April 14, 2022

Leah C. Aden**

Stuart Naifeh**

Raymond Audain**

John S. Cusick**

NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC.
40 Rector St, 5th Fl.

NY, NY 10006

Tel.: (212) 965-7715

laden@naacpldf.org

Antonio L. Ingram II**

NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC.

700 14th St, Ste. 600

Washington, D.C. 20005

Tel.: (202) 682-1300

aingram@naacpldf.org

Adriel I. Cepeda Derieux**

Samantha Osaki**

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION

125 Broad Street, 18th Floor

New York, NY 10004

Tel.: (212) 549-2500

acepedaderieux@aclu.org

John A. Freedman**

Elisabeth S. Theodore*

Adam Pergament**

Gina M. Colarusso**

John M. Hindley**

ARNOLD & PORTER KAYE SCHOLER

LLP

601 Massachusetts Ave., N.W.

Washington, D.C. 20001

Tel: (202) 942-5000

john.freedman@arnoldporter.com

Janette M. Louard*

Anthony P. Ashton*

Anna Kathryn Barnes*

NAACP OFFICE OF THE GENERAL
COUNSEL

4805 Mount Hope Drive

Respectfully submitted,

/s/ Christopher J. Bryant

Christopher J. Bryant, Fed. ID 12538

BOROUGHHS BRYANT, LLC

1122 Lady St., Ste. 208

Columbia, SC 29201

Tel.: (843) 779-5444

chris@boroughsbryant.com

Somil B. Trivedi**

Patricia Yan**

AMERICAN CIVIL LIBERTIES UNION

FOUNDATION

915 15th St., NW

Washington, DC 20005

Tel.: (202) 457-0800

strivedi@aclu.org

Allen Chaney, Fed. ID 13181

AMERICAN CIVIL LIBERTIES UNION

OF SOUTH CAROLINA

Charleston, SC 29413-0998

Tel.: (843) 282-7953

Fax: (843) 720-1428

achaney@aclusc.org

Jeffrey A. Fuisz**

Paula Ramer**

ARNOLD & PORTER KAYE SCHOLER

LLP

250 West 55th Street

New York, NY 10019

Tel: (212) 836-8000

jeffrey.fuisz@arnoldporter.com

Sarah Gryll**

ARNOLD & PORTER KAYE SCHOLER

LLP

70 West Madison Street, Suite 4200

Chicago, IL 60602-4231

Tel: (312) 583-2300

sarah.gryll@arnoldporter.com

*Counsel for Plaintiff the South Carolina
Conference of the NAACP*

Baltimore, MD 21215
Tel: (410) 580-5777
jlouard@naacpnet.org

*Counsel for Plaintiff the South Carolina
Conference of the NAACP*

*Counsel for Plaintiffs the South Carolina
Conference of the NAACP and Taiwan Scott*

* Motion for admission *Pro Hac Vice*
forthcoming

** Admitted *Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2022, a true and correct copy of the foregoing was served on all counsel of record by electronic mail.

/s/ Christopher Bryant
Christopher Bryant